IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

KAREN ANDERSON, et al.	••,	
	Plaintiffs,)
V.) Civil Action No. 3:13-cv-0419-REP
CAMIEL L WHITE D.C.)
SAMUEL I. WHITE, P.C.,)
	Defendant.)

AMENDED RESPONSE TO DEFENDANT'S MOTION FOR LEAVE TO FILE A MOTION FOR SUMMARY JUDGMENT ON COUNT II OF PLAINTIFFS' AMENDED COMPLAINT A LATER DATE

COMES NOW the Plaintiffs, by counsel, to consent to Defendant's motion to file a second, additional motion for summary judgment at a later point in time in this case. (Doc. 36.) Normally, a party is entitled to one motion pursuant to Fed. R. Civ. P. 56. The parties have been in contact regarding this request prior to and after Defendant filed its motion for leave file a second motion for summary judgment. After meeting and conferring on the matter, and considering the Defendant's reasons for seeking leave, the Plaintiffs have consented to a second motion for summary judgment with Defendant's agreement that Defendant's memoranda in support of each motion be limited to twenty pages, Plaintiff's responses would be limited to twenty pages and the Defendant's replies would be limited to fifteen pages.

Respectfully submitted,

KAREN ANDERSON, et al.

<u>/s/</u>
Kristi Cahoon Kelly, Esq. (VSB #72791)
Andrew J. Guzzo, Esq. (VSB #82170)

Kelly & Crandall PLC 4084 University Drive, Suite 202-A Fairfax, VA 22030 703-277-9774 Fax: 703-591-9285

Email: kkelly@kellyandcrandall.com Email: aguzzo@kellyandcrandall.com

Leonard Anthony Bennett, Esq. (VSB #37523) Susan Mary Rotkis, Esq. (VSB #40693) Consumer Litigation Associates 763 J Clyde Morris Boulevard, Suite 1A Newport News, VA 23601 757-930-3660

Fax: 757-930-3662

Email: lenbennett@clalegal.com Email: srotkis@clalegal.com

Matthew James Erausquin, Esq. (VSB #65434) Consumer Litigation Associates PC 1800 Diagonal Road, Suite 600 Alexandria, VA 22314 703-273-6080

Fax: 888-892-3512

Email: matt@clalegal.com

Dale Wood Pittman, Esq. (VSB #15673) The Law Office of Dale W. Pittman, P.C. 112-A W Tabb St Petersburg, VA 23803-3212 (804) 861-6000

Fax: (804) 861-3368

Email: <u>dale@pittmanlawoffice.com</u>

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of March 2014 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

John C. Lynch, VSB No. 39267 Maryia Y. Jones, VSB No. 78645 Troutman Sanders LLP 222 Central Park Ave., Ste. 2000 Virginia Beach, VA 23462 Tel. 757-687-7765 Fax. 757-687-1504

Email: john.lynch@troutmansanders.com
Email: maryia.jones@troutmansanders.com

Counsel for the Defendant

/s/

Leonard A. Bennett, Esq. (VSB#37523) Susan Mary Rotkis, Esq. (VSB #40693) Consumer Litigation Associates 763 J Clyde Morris Boulevard, Suite 1A Newport News, VA 23601 757-930-3660

Fax: 757-930-3662

Email: lenbennett@clalegal.com
Email: srotkis@clalegal.com